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16                   So I would like to begin by calling certain  
17   elected officials. I think our first person who signed up  
18   is Michael Dorame. And I will ask each speaker to step up  
19   to the microphone and identify themselves and an  
20   organizational affiliation, if appropriate.

21                   Welcome.

22                   MR. DORAME: Thank you, Holmes.

23                   First of all, on behalf of the Inyo County  
24   Board of Supervisors, I would like to thank the Department  
25   of Energy for providing Inyo County and California with

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1 today's hearing. We hope your visit here is informative  
2 and productive for both DOE and the residents of the  
3 region.

1... 4 [The county's primary concern with the EIS is  
5 the superficial analysis of the transportation campaign  
6 necessary to move some 70,000 or more tons of radioactive  
7 waste into Yucca Mountain. In terms of short-term risks to  
8 humans, the hazards associated with transportation pose the  
9 greatest threat to populations across the nation.

10 The transportation campaign is an integral  
11 part of the Yucca Mountain project. It is inseparable from  
12 the operation of the proposed repository. Consideration,  
13 in detail, of transportation impacts cannot reasonably be  
14 deferred to future analysis any more than other off-site  
15 impacts.

16 Without detailed information on likely  
17 primary and secondary routes in California and the staging  
18 of shipments, it is impossible for Inyo County to evaluate  
19 the impacts of the shipping campaign on our area.

20 At present, State Route 127 is being  
21 utilized for shipment of low-level nuclear waste to the  
22 Nevada test site, and may be used for shipment of  
23 transuranic waste from the test site to the Waste Isolation  
24 Pilot Plant in Carlsbad, New Mexico. This makes State  
25 Route 127 a likely candidate for eventual shipments of

1 cont. 1 high-level waste.

2 The Nuclear Waste Policy Act, section  
3 180(c), calls for federal action to provide improvements in  
4 emergency response training and capability along the routes  
5 designated for the transport of high-level nuclear waste  
6 and spent fuel. The virtual absence of emergency response  
7 capability on Route 127 and the isolated character and the  
8 current configuration of this roadway promise to make  
9 compliance with this part of the act an involved and  
10 expensive exercise on the part of the federal government.

11 Other necessary improvements will include  
12 complete reconstruction of some sections of the roadway and  
13 a construction 'equipping' and staffing of emergency  
14 response stations. The county and the state will be  
15 saddled with significant new costs to safeguard its  
16 residents. The EIS fails to address in any manner the  
17 significant fiscal and possibly significant environmental  
18 impacts of meeting those obligations. These impacts, too,  
19 are inseparable from the repository itself and need to be  
20 quantified by the EIS.

3... 21 The EIS needs to include a risk analysis  
22 comparing, at a national level, all probable primary and  
23 secondary shipment routes coming into Yucca Mountain.  
24 Again, absent information on the range of impacts expected  
25 to accrue to the project, we ask citizens, and the federal

3 cont.

1 and state decision-makers expected to use the EIS are left  
2 without the tools to weigh risks, evaluate alternatives, or  
3 recognize what constitutes an unavoidable transportation  
4 impact.

5                   Route choice will affect the safety, cost,  
6 and timing of transport operations. DOE needs to engage in  
7 a comprehensive study of this issue in order to develop a  
8 scientifically defensible least-risk-based determination of  
9 routes. Private carriers should not be burdened with the  
10 responsibility to evaluate and choose those routes. The  
11 preferred corridor should be mapped by DOE and the required  
12 roadway and emergency response improvements identified. In  
13 this way, the total impact and cost of the project can be  
14 laid out for public review.

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15                   As issued, the EIS treats the transportation  
16 campaign as a shadowy, vague topic. To readers of the EIS,  
17 it appears that DOE is deliberately avoiding the issue  
18 because it will, no doubt, generate a volatile nationwide  
19 response. We would submit, however, that there is little  
20 use in pursuing the repository until we have made a  
21 determination that the risks and costs associated with  
22 transporting the waste are less than those associated with  
23 leaving it where it is. These issues need to be settled to  
24 the satisfaction of the majority of the impacted  
25 population.

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5 1 Finally, Inyo County has a strong preference  
2 for a rail-focused option which off-loads the bulk of the  
3 waste east of the site. Lincoln County, Nevada, has  
4 already indicated its support for an intermodal transfer  
5 site within its jurisdiction. Development of this site  
6 would avoid reliance on transportation corridors in  
7 high-risk areas south and west of Yucca Mountain and place  
8 one of the major components of the project in a  
9 jurisdiction that is amenable to the operation.

6 10 To conclude, we are of the opinion that the  
11 Environmental Impact Statement's superficial treatment of  
12 transportation is, regardless of other considerations,  
13 sufficient to invalidate the EIS for purposes of evaluating  
14 the implications of operating the repository.

15 A transportation-focused supplement to the  
16 EIS should be developed which identifies specific routes  
17 and includes a comprehensive transportation risk analysis.  
18 Until such a supplement is available to the public, it will  
19 be impossible to evaluate any alternatives to the process.  
20 Until the document has been developed and exposed for  
21 public review, there is little point in proceeding with the  
22 current Environmental Impact Statement.

23 I thank you very much for your indulgence.

24 THE FACILITATOR: Our second speaker is Mr. Irwin  
25 Lent.

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1 MR. LENT: I'm not ready.

2 THE FACILITATOR: I saw you still writing there, so

3 we will go on.

4 Susan Zimmerman.